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17 *Counsel for Plaintiffs*

18 **UNITED STATES DISTRICT COURT**
 19 **NORTHERN DISTRICT OF CALIFORNIA**
 20 **SAN FRANCISCO DIVISION**

21 ANIBAL RODRIGUEZ, et al. individually and on
 22 behalf of all others similarly situated,

23 Plaintiff,

24 vs.

25 GOOGLE LLC,

26 Defendant.

27 Case No. 3:20-CV-04688-RS

28 **JOINT STIPULATION AND
 [PROPOSED] ORDER EXTENDING
 DISCOVERY, CLASS CERTIFICATION
 BRIEFING SCHEDULE, AND
 HEARING DATE**

STIPULATION EXTENDING DISCOVERY, CLASS CERTIFICATION BRIEFING SCHEDULE, AND
 HEARING DATE
 Case No. 3:20-CV-04688-RS

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”)
 2 and Defendant Google LLC (“Google”), collectively referred to as the “Parties,” hereby enter into
 3 this joint stipulation.

4 WHEREAS, on November 22, 2021, the Court granted plaintiffs’ Motion for Relief from
 5 Case Management Schedule, extending the deadlines for the close of fact discovery, initial expert
 6 witness disclosures, rebuttal expert witness disclosures, and the close of expert discovery (Dkt. 180),
 7 and

8 WHEREAS, on February 1, 2022, the parties stipulated to a new class certification briefing
 9 schedule and hearing date consistent with the Court’s November 22, 2021 order (Dkt. 214), which
 10 the Court entered on February 1, 2022 (Dkt. 215), and

11 WHEREAS, the parties have been working diligently to complete discovery in this case
 12 pursuant to the Court’s deadlines, and

13 WHEREAS, until recently, several outstanding discovery issues were pending before the
 14 Court that affect the scope of discovery.

15 WHEREAS, the prior extensions of the case schedule set by the Court have been limited,

16 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
 17 parties to this action, that the following dates and deadlines for further proceedings should apply to
 18 this case, which amounts to about a 75-day extension of key deadlines in the current schedule:

- 19 • Close of Fact Discovery: September 26, 2022
- 20 • Initial Expert Witness Disclosures: October 13, 2022
- 21 • Rebuttal Expert Witness Disclosures: January 20, 2023
- 22 • Close of Expert Discovery: February 16, 2023
- 23 • Motion for Class Certification: February 23, 2023
- 24 • Opposition to Motion for Class Certification: March 30, 2023
- 25 • Reply In Support of Class Certification: April 27, 2023
- 26 • Hearing on Class Certification: At the Court’s discretion, but proposed
 for May 11, 2023 at 1:30 PM

1 A Proposed Order is submitted concurrently herewith.

2 Good cause exists for this slight continuance of the schedule to allow the parties to
3 complete ordered and pursued discovery.

4 IT IS SO STIPULATED.

5
6 DATED: May 20, 2022

WILLKIE FARR & GALLAGHER, LLP

7 By: /s/ Benedict Y. Hur
8 Benedict Y. Hur

9 *Attorneys for Defendant Google LLC*

10 DATED: May 20, 2022

11 By: /s/ Amanda Bonn

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21 *Attorneys for Plaintiff*

1 **FILER'S ATTESTATION**

2 Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this
3 filing is submitted, concur in the filing's content and have authorized this filing.

4 DATED: May 20, 2022

5 SUSMAN GODFREY L.L.P.

6

7 _____
8 /s/ *Amanda Bonn*
9 Amanda Bonn

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Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ANIBAL RODRIGUEZ, et al. individually and on behalf of all others similarly situated.

Plaintiff,

VS.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**[PROPOSED] ORDER EXTENDING
DISCOVERY, CLASS CERTIFICATION
BRIEFING SCHEDULE, AND
HEARING DATE**

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the deadlines in this case are extended as follows:

- Close of Fact Discovery: September 26, 2022
- Initial Expert Witness Disclosures: October 13, 2022
- Rebuttal Expert Witness Disclosures: January 20, 2023
- Close of Expert Discovery: February 16, 2023
- Motion for Class Certification: February 23, 2023
- Opposition to Motion for Class Certification: March 30, 2023
- Reply In Support of Class Certification: April 27, 2023
- Hearing on Class Certification: May 11, 2023 at 1:30 PM

IT IS SO ORDERED.

Dated: _____

Honorable Richard Seeborg